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J.R.A. DEPT. ROOM 1

REVISED 10/20/03

## Certification of Disaggregation Plan

04-00098

The following incumbent local exchange carriers operating in the State of Tennessee, have elected to follow Path 2, State Regulatory Approval Required for Disaggregation of Federal USF Support, for the following Study Areas:

Company / Study Area

Study Area Code

Citizens Telecommunications Company of Tennessee, LLC

294336

The following incumbent local exchange carriers operating in the State of Tennessee, have elected to follow Path 3, Self-Certification for Disaggregation of Federal USF Support, for the following Study Areas:

Company / Study Area

Study Area Code

Citizens Telecommunications Company of the Volunteer State, LLC

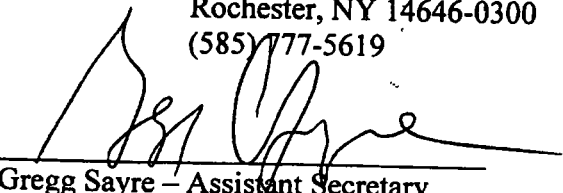
290577

Name and Address of Individuals to be contacted concerning this Plan:

Mr. Randall J. Brockmann  
Manager – Economic Costing  
Frontier Corporation  
180 South Clinton Avenue  
Rochester, NY 14646-0400  
(585) 777-1056

Mr. Kenneth F. Mason  
Director – Federal Regulatory  
Frontier Corporation  
180 South Clinton Avenue  
Rochester, NY 14646-0300  
(585) 777-5619

Corporate Officer Signature:

  
Gregg Sayre – Assistant Secretary

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**frontier®**  
A Citizens Communications Company

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MAY 13 2002

300 Bland Street  
P. O. Box 770  
Bluefield, WV 24701

May 6, 2002

**CITIZENS TELECOM**

Mr. David Waddell  
Executive Director  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

**Ref: USF Disaggregation Plan**

Dear David:

In conformance with Section 54.315 of the FCC rules above, this filing designates the Company's election for the Path of Disaggregation for the following rural incumbent local exchange companies operating in the State of Tennessee.

**Path 2: State Regulatory Approval for Federal USF Support Disaggregation Plan**  
Citizens Telecommunications Company of Tennessee, LLC

**Path 3: Self-Certification for Disaggregation of Federal USF Support**  
Citizens Telecommunications Company of the Volunteer State, LLC

For each of the Study Arcas listed above, we have enclosed an affidavit titled "Certification of Disaggregation Plan" which provides a statement declaring the selected path for disaggregation the Company has selected, the name and address of the individual to be contacted concerning the plan being filed, the Study Area Code (SAC) assigned under the Federal Universal Service Fund (USF) program, and the signature of an authorized Corporate Officer.

In addition, for each Study Area we have enclosed a complete description of the rationale used to compute and disaggregate the Federal USF support by category of support, the wire centers which comprise each support zone, the Federal USF support per line per wire center (Exhibit 1), and exchange boundary maps which clearly identify the wire center boundaries of the designated disaggregation zones within the Company's study area.

Complete copies of this filing are also being sent to the Universal Service Administrative Company (USAC) in accordance with the FCC rules.

Should you have any questions on the information included in this filing, please contact me or the individuals listed on the enclosed "Certification of Disaggregation Plan" document.

Sincerely,



J. Michael Swatts  
Director, State Government Affairs

Enclosures

xc: Administrator-USAC  
Timothy Phillips, Esq. – AG's Office  
M. Shultz  
R. Brockmann



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Name and Address of Individuals to be contacted concerning this Plan:

Mr. Randall J. Brockmann  
Manager - Economic Costing  
Frontier Corporation  
180 South Clinton Avenue  
Rochester, NY 14646-0400  
(585) 777-1056

Mr. Michael J. Shultz  
Director - Federal Regulatory  
Frontier Corporation  
180 South Clinton Avenue  
Rochester, NY 14646-0300  
(585) 777-5619

Corporate Officer Signature: \_\_\_\_\_

*Gregg Sayre*  
Gregg Sayre - Assistant Secretary

CTC of Tennessee

SAC Number: 294336

Exhibit 1

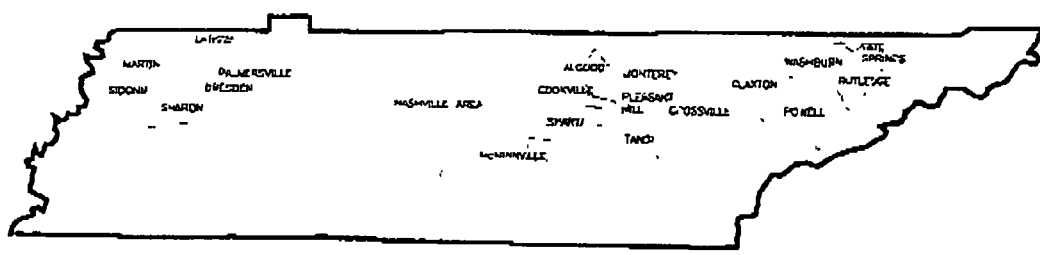
Citi	Exchange	Lines	Per Line LSS	Per Line HCF, IAF, LTS	Per Line
Zone 1					
MMVLTNXADS0	McMinnville	3,354	\$ -	\$ -	\$ -
MARTTNXADS0	Martin	7,787	\$ -	\$ -	\$ -
CKVLTNXADS0	Cookeville	25 960	\$ -	\$ -	\$ -
ALGDTNXARS0	Algood	3,217	\$ -	\$ -	\$ -
SHRNTNXADS0	Sharon	971	\$ -	\$ -	\$ -
CSVLTNXADS0	Crossville	21,779	\$ -	\$ -	\$ -
SPRTTNXARS0	Sparta	1,691	\$ -	\$ -	\$ -
Total		64,699	\$ -	\$ -	\$ -
Zone 2					
DRSDTNXADS0	Dresden	3,586	\$ -	\$ 13.36	\$ 13.36
MTRYTNXARS0	Monterey	2,828	\$ -	\$ 15.71	\$ 15.71
TANSTNXARS0	Tansi	4,452	\$ -	\$ 20.08	\$ 20.08
Total		10,866	\$ -	\$ 16.72	\$ 16.72
Zone 3					
PLHLTNXARS0	Pleasant Hill	1,767	\$ -	\$ 23.23	\$ 23.23
PLVLTNXARS0	Paimersville	507	\$ -	\$ 37.42	\$ 37.42
SIDNTNXARS0	Sidonia	325	\$ -	\$ 37.79	\$ 37.79
LTHMTNXARS0	Latham	389	\$ -	\$ 43.44	\$ 43.44
Total		2,988	\$ -	\$ 29.85	\$ 29.85
Total Lines		78,553			

CTC of the Volunteer State  
SAC Number: 290580

Exhibit 1

Call	Exchange	Lines	Per Line LSS	Per Line WCF, IAF, LTS	Per Line
<b>Zone 1</b>					
POWLTXADS0	Powell	14,046	\$ 2.01	\$ -	\$ 2.01
CXTNTNXARS0	Claxton	2,766	\$ 2.01	\$ -	\$ 2.01
	<b>Total</b>	<b>16,812</b>	<b>\$ 2.01</b>	<b>\$ -</b>	<b>\$ 2.01</b>
<b>Zone 2</b>					
RTLGTNXADS1	Rutledge	3,716	\$ 2.01	\$ 9.16	\$ 11.16
WSBNTNXARS0	Washburn	1,178	\$ 2.01	\$ 12.31	\$ 14.31
TTSP7NXARS0	Tate Springs	1,585	\$ 2.01	\$ 13.70	\$ 15.70
	<b>Total</b>	<b>6,485</b>	<b>\$ 2.01</b>	<b>\$ 10.84</b>	<b>\$ 12.85</b>
<b>Zone 3</b>					
	<b>Total</b>				
	<b>Total Lines</b>	<b>23,301</b>			

REVISIONS			
ISSUE	WORK ORDER #	ENG	DRAFT
START CITIZENS COMMUNICATIONS			
ESTABLISH DRAWING			
1	N/A	N/A	SLJ 6/90



EXCHANGE BOUNDARY, CITIZENS PROPERTY

<b>CITIZENS</b> <small>COMMUNICATIONS</small>	
DWG NAME EXCHANGE BOUNDARY MAP	
FACILITY LOCATION TENNESSEE	
CELL CODE N/A	BUSINESS AREA N/A
SCALE NTS	CAD FILE TN-EXCHANGE
DRAFT SLJ DATE 6/90	ENG DATE N/A ISSUED DATE
DWG NO 1 OF 1	NO TN-EXCH BOUND

DWG. SIZE C



## USF Disaggregation Plan

### Methodology Used for Path 2 and Path 3 Certifications

The following document describes the Disaggregation Plan and specific procedures used by Frontier, a Citizen's Communications Company (the "Company"), to determine the allocation of its' Federal Universal Service Fund (USF) support per line, per Study Area. The plan is based in part, on wire center costs as developed from forward-looking cost proxy models.

The Company began by segregating wire centers within each Study Area into three separate cost zones based on line cost estimates from two forward looking cost proxy models – the Citizens Costmap Wireline Model and the HAI 5.0a model<sup>1</sup>. For each of the Company's Study Areas within the State, a forward-looking weighted average cost per line was computed. Next, for each of the wire centers in a given Study Area, an average cost per line, per wire center was computed. The average cost per line, per wire center was then compared to the average cost per line for the entire Study Area. The wire centers were then classified into three cost zones depending on the relationship between the average cost per line for the wire center and the average cost per line for the study area. Zone 1 includes all wire centers whose average cost per line were below 75% of the study area average cost per line. Zone 2 includes those wire centers whose average cost per line were between 75% and 125% of the study area average and Zone 3 includes all wire centers greater than 125% of the study area average.

Next the Company calculated the estimated Federal Universal Support per line by dividing its 2002 budgeted USF support by study area over the 12/31/2001 access line counts. The Company disaggregated the USF support per study area between local switching support (LSS), high cost fund (HCF), interstate access support (IAF) and long-term support (LTS). The final allocation was to spread the aggregate USF support dollars over all wire centers in the three cost zones.

<sup>1</sup> Estimated forward looking line costs for Citizen's wire centers were computed using the Company's Cosimap Wireline Model, while estimated forward looking line costs for Frontier's wire centers were computed using results from the HAI Model, v5.0a.



The Company first allocated the LSS (assuming the Company receives this support in the Study Area), equally by wire center over all lines in the study area. This is based on the fact that LSS support is generally not influenced by factors such as distance and density, both of which directly affect loop costs. The LSS cost per line was computed by dividing the annual LSS expected by the total access lines in the Study Area. The remainder of the Federal USF support (HCF, IAF & LTS) was added together for each Study Area and allocated between cost Zones 2 and 3. These support dollars were allocated between Zones 2 and 3 on the basis of the ratio of the wire center's total cost per Zone to the total combined cost of Zones 2 and 3. The wire center's total cost is equal to the average cost per line, as computed by the cost proxy model, times the number of access lines in the wire center. The total allocated costs to each wire center were then divided by the access lines in that wire center to arrive at the total allocated USF per line, per wire center. -

In summary, under the Company's plan, each wire center is classified into only one distinct cost zone. Support on a per line basis is then based on the relationship of the total cost of the specific wire center to the total cost of all wire centers included in that cost zone.